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PATRICK O'TOOLE, JR.
DIRECT LINE 617-772-8365
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August 19, 2005

BY HAND

Clerk's Office, Civil
United States District Court
District of Massachusetts
1 Courthouse Way
Boston, Massachusetts 02108

Re: *Steven B. Belkin v. Bruce Levenson, et al.*,
U.S.D.C. (D. Mass.), Civil Action No. 05-11695 RCL

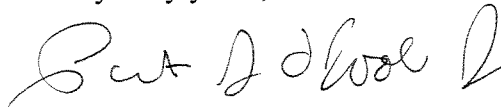
Dear Sir/Madam:

Enclosed for filing is a Joint Motion to Stay.

As proof of filing, please date-stamp the copies of this letter and the Joint Motion to Stay and return them to the awaiting messenger.

Thank you for your assistance with this matter.

Very truly yours,



Patrick J. O'Toole, Jr.

Enclosures

cc: John G. Fabiano, Esq. (via electronic mail)

COPY

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

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U.S. DISTRICT COURT
DISTRICT OF MASS

STEVEN B. BELKIN,

Plaintiff,
v.

BRUCE LEVENSON,
ED PESKOWITZ,
J. MICHAEL GEARON, JR.,
J. RUTHERFORD SEYDEL II,
LPF ATLANTA LLC, and
SSG GROUP, LLC,

Defendants.

Civil Action No. 1:05-cv-11695-RCL

JOINT MOTION TO STAY

Plaintiff Steven B. Belkin ("Plaintiff") and defendants Bruce Levenson, Ed Peskowitz, J. Michael Gearon Jr., J. Rutherford Seydel II, LPF Atlanta LLC and SSG Group, LLC ("Defendants") hereby jointly move that this Court enter an order staying all further proceedings with respect to the above-captioned action. As grounds for the stay, the parties state that they have completed a Purchase and Sale Agreement which will, upon consummation of the terms of that agreement, result in a settlement of this litigation.

On August 4, 2005, Plaintiff brought an action against Defendants in the Superior Court of Suffolk County, Commonwealth of Massachusetts, styled Steven B. Belkin v. Bruce Levenson, Ed Peskowitz, J. Michael Gearon, Jr., J. Rutherford Seydel II, LPF Atlanta LLC and SSG Group, LLC, Civil Action No. 05-3287 (BLS). On August 12, 2005, Defendants filed a Notice of Removal, and the case was removed to this Court. On August 19, 2005, Plaintiffs filed a Motion to Remand pursuant to 28 U.S.C. §1447(c).

On August 19, 2005, the parties entered into a Purchase and Sale Agreement, which will, upon the consummation of the terms of that agreement, result in a settlement of this litigation. The parties will use their best efforts to consummate the terms of the settlement; however, the parties agree that Defendants will have fifteen (15) days after the date the stay of this matter is vacated or expires or this Motion is denied to file a response to Plaintiff's Motion to Remand and to answer, move or otherwise plead regarding Plaintiff's Verified Complaint. Additionally, the parties agree that Plaintiff will have the same fifteen (15) days to respond to the pending Defendants' Motion to Compel Arbitration.

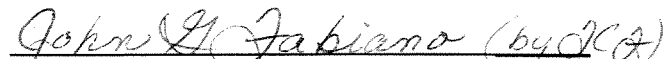
WHEREFORE, the parties respectfully request that this Motion be allowed and that this Court stay all further proceedings pertaining to this case.

Respectfully Submitted,

PLAINTIFF

STEVEN B. BELKIN

By his attorneys,


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J. MICHAEL GEARON, JR.,
J. RUTHERFORD SEYDEL II,
LPF ATLANTA LLC, and
SSG GROUP, LLC

By their Attorneys,


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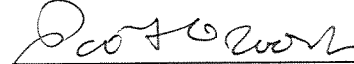
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Joint Motion to Stay was served upon the attorney of record for each other party by mail – hand on this 19th day of August, 2005.



Patrick J. O'Toole

LOCAL RULE 7.1 CERTIFICATION

The parties have conferred on this matter pursuant to Local Rule 7.1(A)(2).

/s/ John G. Fabiano